CR-ERNS Report -- Addendum to Form R

This Form serves as an addendum to EPCRA Section 313 Toxic Release Inventory (TRI) Form R. This along with EPCRA 313 Form R will provide EPA with the required information for reporting continuous releases.

Name of Facility: Coffeen Power Station

CR-ERNS #: 626033

Type of Report: Indicate below the type of report you are submitting.

☐ Initial Written Report	☐ First Anniversary Follow-up Report	☐ Written Notification of a Change to Initial Written Report	☑ Written Notification of a Change to Follow-up Report

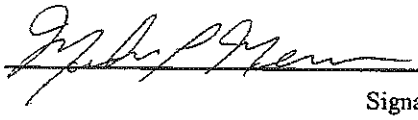
Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submtted information is accurate and current to the best of my knowledge.

Michael L. Menne, VP Environmental Services

Name and Position

01/04/2010

Date



Signature

Population Density: Choose the range that describes the population density within a one-mile radius of your facility.

____	0 - 50 people	____	101 - 500 people	____	Over 1000 people
✓	51-100 people	____	501- 1000 people		

Sensitive Populations and Ecosystems: Indicate all sensitive populations and ecosystems within a one-mile radius include the distance and direction from the facility.

Sensitive Population or Ecosystems	Distance and direction from facility
Potential Bald Eagle habitat	Within 1 mile surrounding facility
Potential Eastern Blue-Eyed Grass habitat	Within 1 mile surrounding facility

CR-ERNS Report -- Addendum to Form R

CR-ERNS #: 626033

Source Information: For EACH source of a release from your facility, provide the following information on a SEPARATE sheet.

Name of Source: stack

Indicate whether the release from this source is either:
continuous without interruption _____ OR routine, anticipated, intermittent _____

Pattern of the Release: Identify below how you established the pattern of release and calculated release estimates.

- ✓ Past release data
- ✓ Knowledge of the facility's operations and release history
- ✓ Engineering Estimates
- _____ AP-42
- ✓ Best professional judgement
- _____ Other (explain)

Environmental Medium affected by the release from this source:

- ✓ Air
- _____ Surface Water
- _____ Soil or Ground Water

Air

If release is to air, please indicate stack height OR surface area of the release.

500 ft Stack Height OR _____ Surface Area

Surface Water

If release is to Surface Water, please indicate name, type and specific information of the water body:

Name of water body _____

If stream: _____ Stream Order OR _____ Average flow rate (ft^3/sec)

If lake: _____ Surface area (ac) AND _____ Average Depth (m)

Soil or Ground Water

Indicate distance of closest water well: _____

Hazardous Substance Information:

Name of Hazardous Substance:	CASRN#	Upper Bound (in lbs. or kg per day)	Lower Bound (in lbs. or kg per day)	Number of Days Release Occurs (per year)	Months of the Release
Hydrochloric Acid	7647-01-0	21,344	64	320	Jan. thru Dec.
Hydrofluoric Acid	7664-39-3	1,218	510	320	Jan. thru Dec.
Sulfuric Acid	7664-93-9	5,184	104	320	Jan. thru Dec.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION I: GENERAL INFORMATION		CR-ERNS Number:	626,033
Date of Initial Release:	Ongoing	Date of Initial Call to NRC:	10-14-2002
Type of Report: Select from the drop-down list, the type of report that you are submitting	Written Notification of a Change to Follow-up Report		

Signed Statement: *I certify that the hazardous substance releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.32 and that all submitted information is accurate and current to the best of my knowledge.*

Date 1/12/16 *Name and Position* Randy O'Keefe *Signature* Randy O'Keefe

Part A. Facility or Vessel Information

Name of Facility or Vessel: Coffeen Power Station

Person in Charge of Facility or Vessel
Name: Randy O'Keefe | Position: Managing Director
Phone Number: +1 (217) 534-7646 | Alt Phone No.: +1 (618) 223-3371

Facility Address or Vessel Port of Registration
Street: 134 CIPS Lane | County: Montgomery
City: Coffeen | State: IL | Zip Code: 62017

Dun and Bradstreet Number for Facility: 157,912,242

Facility/Vessel Location

	Deg	Min	Sec
Latitude	39	3	31
Longitude	89	24	11

Vessel LORAN Coordinates:

NOTE: Latitude/Longitude information can be obtained at the following websites: http://www.satsig.net/maps/lat-long-finder.htm, http://earth.google.com/, and http://www.census.gov/geo/landview/. Do not use P.O. Box, Rural Route or Mailing Address. Use physical location only.

Part B. Population Information

Population Density

Select from the drop-down list, the range that describes the population density within a one-mile radius of your facility or vessel.	51 - 100 persons

Sensitive Populations and Ecosystems within One-Mile Radius

Sensitive Populations or Ecosystems (e.g., elementary schools, hospitals, retirement communities, or wetlands)	Estimated Distance and Direction from Facility, if Known
None	

Continuous Release Reporting Form

SECTION II: SOURCE INFORMATION	CR-ERNS Number: 626,033

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.

Name of Source:	Coffeen Power Station - Unit 1 Stack

1. Indicate whether the release from this source is either:

☒ Continuous without interruption **OR** ☐ routine, anticipated, intermittent & incidental to

Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the **note** above.

During the combustion process, the nitrogen that is present naturally in the coal, and the nitrogen and oxygen present in the combustion air combine to form NOx. Prior to being released to the atmosphere, the exhaust gas is passed through a large catalyst where the NOx reacts with the catalyst and anhydrous ammonia and is converted to nitrogen and water. Selective catalytic reduction removes between 80 and 90 percent of the NOx that is in the exhaust gas of a coal-fired power plant.

3. Identify below how you established the pattern or release and calculated release estimates.

☒ Release data ☒ Knowledge of Operating Procedures ☐ Engineering estimate ☐ Best Professional judgment

Other -

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 626,033

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.

Name of Source: Coffeen Power Station - Unit 2 Stack

1. Indicate whether the release from this source is either:

☒ Continuous without interruption **OR** ☐ routine, anticipated, intermittent & incidental to

***Note** that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.*

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the **note** above.

During the combustion process, the nitrogen that is present naturally in the coal, and the nitrogen and oxygen present in the combustion air combine to form NOx. Prior to being released to the atmosphere, the exhaust gas is passed through a large catalyst where the NOx reacts with the catalyst and anhydrous ammonia and is converted to nitrogen and water. Selective catalytic reduction removes between 80 and 90 percent of the NOx that is in the exhaust gas of a coal-fired power plant.

3. Identify below how you established the pattern or release and calculated release estimates.

☒ Release data ☒ Knowledge of Operating Procedures ☐ Engineering estimate ☐ Best Professional judgment

Other -

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 626,033

Name of Source: Coffeen Power Station - Unit 1 Stack

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

◉ **AIR** If the medium affected is air, please also specify whether the source is a **stack** or a ground-based **area source**.

☒ **Stack** Indicate stack height in feet or meters: 575 feet

○ **SURFACE WATER**

If the release affects any **surface water body**, give the name of the water body.

☐ **Surface Water Body**

☐ **Stream** If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

Stream Order **OR** Average Flow Rate (cubic feet/second)

☐ **Lake** Surface area of lake (in acres) Average depth of lake (in meters)

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

○ **SOIL OR GROUND WATER**

If the release is on or under ground, the location of public water supply wells within two miles.

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters) Gas Exit Velocity (ft or meters/sec) Gas Temp (degrees Fahrenheit, Kelvin, or Celsius)

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second)

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 626,033

Name of Source: Coffeen Power Station - Unit 2 Stack

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

◉ **AIR** If the medium affected is air, please also specify whether the source is a **stack** or a ground-based **area source**.

☒ **Stack** Indicate stack height in feet or meters: 575 feet

○ **SURFACE WATER**

If the release affects any **surface water body**, give the name of the water body.

☐ **Surface Water Body**

☐ **Stream** If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

Stream Order _____ **OR** Average Flow Rate (cubic feet/second) _____

☐ **Lake** Surface area of lake (in acres) _____ Average depth of lake (in meters) _____

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

○ **SOIL OR GROUND WATER**

If the release is on or under ground, the location of public water supply wells within two miles.

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters) _____ Gas Exit Velocity (ft or meters/sec) _____ Gas Temp (degrees Fahrenheit, Kelvin, or Celsius) _____

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second) _____

Continuous Release Reporting Form

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 626,033

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source: Coffeen Power Station - Unit 1

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day) Upper Bound	Normal Range (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
Ammonia	7664-41-7	39 lbs.	0	314	9,350 lbs.	Jan - Dec
Hydrochloric Acid	7647-01-0	8.9 lbs.	0	314	782 lbs.	Jan - Dec
Hydrogen Flouride	7661-39-3	13 lbs.	0	314	3,092 lbs.	Jan - Dec
Sulfuric Acid	7664-93-9	30 lbs.	0	314	7,087 lbs.	Jan - Dec

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Components (in lbs., kg, or Ci per day) Lower Bound	OR Normal Range of Mixture (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Mixture (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release
None										

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 626,033

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source: Coffeen Power Station - Unit 2

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day) Upper Bound	Normal Range (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
Ammonia	7664-41-7	68 lbs.	0	313	16,404 lbs.	Jan - Dec
Hydrochloric Acid	7647-01-0	5.6 lbs.	0	313	1,371 lbs.	Jan - Dec
Hydrogen Flouride	7661-39-3	22 lbs	0	313	5,423 lbs.	Jan - Dec
Sulfuric Acid	7664-93-9	51 lbs.	0	313	12,433 lbs.	Jan - Dec

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Components (in lbs., kg, or Ci per day) Lower Bound	OR	Normal Range of Mixture (in lbs., kg, or Ci per day) Upper Bound	Normal Range of Mixture (in lbs., kg, or Ci per day) Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release
None											

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 626,033

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Ammonia, CASRN # 7664-41-7

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
Coffeen Power Station - Unit 1	39 lbs/day
Coffeen Power Station - Unit 2	68 lbs/day

TOTAL - SSI trigger for this hazardous substance release*: 107 lbs/day

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

Continuous Release Reporting Form

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 626,033

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Sulfuric Acid, CASRN # 7664-93-9

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
Coffeen Power Station - Unit 1	30 lbs/day
Coffeen Power Station - Unit 2	51 lbs/day

TOTAL - SSI trigger for this hazardous substance release*: 81 lbs/day

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

Continuous Release Reporting Form

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 626,033

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Hydrochloric Acid, CASRN # 7647-01-0

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
Coffeen Power Station - Unit 1	3.3 lbs/day
Coffeen Power Station - Unit 2	5.6 lbs/day

TOTAL - SSI trigger for this hazardous substance release*: 8.9 lbs/day

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

Continuous Release Reporting Form

SECTION III: SUBSTANCE INFORMATION	CR-ERNS Number: 626,033

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Hydrogen Fluoride, CASNR #7661-39-3

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
Coffeen Power Station - Unit 1	13 lbs/day
Coffeen Power Station - Unit 2	22 lbs/day

TOTAL - SSI trigger for this hazardous substance release*: 35 lbs/day

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

SECTION I: GENERAL INFORMATION

CR-ERNS Number: 626033

Date of Initial Release: 10/14/2002

Date of Initial Call to NRC: 10/14/2002

Type of Report: Indicate below the type of report you are submitting.

- ☐ Initial Written Notification
- ☒ First Anniversary Follow-up Report
- ☐ Written Notification of a Change to Initial Notification
- ☐ Written Notification of a Change to Follow-up Report

Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Michael Menne, VP of ESH
Name and Position

12-09-03
Date

Signature

Part A. Facility or Vessel Information

Name of Facility or Vessel: Coffeen Power Station

Person in Charge of Facility or Vessel

Name of Person in Charge: Jim Williams

Position: Plant Manager

Telephone No. (217) 534-7646 Alternate Telephone No. (217) 534-7600

Facility Address or Vessel Port of Registration

Street: 134 CIPS Lane County: Montgomery

City: Coffeen State: IL Zip Code: 62017

Dun and Bradstreet Number for Facility: 364138990

Facility/Vessel Location

Latitude	Deg 39	Min 03	Sec 31		
Longitude	Deg 089	Min 24	Sec 11		

Vessel LORAN Coordinates:

Part B. Population Information

Population Density

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

___ 0 - 50 persons	___ 101 - 500 persons	___ more than 1000 persons
X 51 - 100 persons	___ 501 - 1000 persons	

Sensitive Populations and Ecosystems Within One Mile Radius

Sensitive Populations or Ecosystems (e.g., schools, hospitals, wetlands, wildlife preserves, etc.)	Distance and direction from facility
None	

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 626033

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Coffeen Power Station stack

1. Indicate whether the release from this source is either:

continuous without interruption ___X___ **OR** routine, anticipated, intermittent _____.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*

Power generation - coal combustion
91% bituminous
9% subbituminous

3. Identify below how you established the pattern of release and calculated release estimates.

___X___ Past release data	___X___ Knowledge of the facility/vessel's operations and release history	___X___ Engineering estimate
____ AP-42	___X___ Best professional judgment	_____ Other (explain)

** Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.*

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 626033

Name of Source: Coffeen Power Station stack

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

⊘ **AIR** X (stack X or area ____) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

- If identified source is a **stack**, indicate stack height: 500 feet ~~or meters~~; **OR**
- If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: _____ square feet or square meters.

⊘ **SURFACE WATER** ____ (stream ____, lake ____, or other _____)

- If the release affects any **surface water body**, give the name of the water body.

  _____

- If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

  stream order: ____ or average flow rate: ____ cubic feet/second; **OR**

- If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

  surface area of lake: ____ acres and average depth of lake: ____ meters.

⊘ **SOIL OR GROUND WATER** ____

If the release is on or under ground, indicate the distance to the closest water well.

_____

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

- For a stack release to air, provide the following information, if available:

  Inside diameter _____ feet or meters
  Gas Exit Velocity _____ feet/second or meters/second
  Gas Temperature _____ degrees Fahrenheit, Kelvin, or Celsius

- For a release to surface water, provide the following information, if available:

  Average Velocity of Surface Water _____ feet/second

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 626033

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Coffeen Power Station stack

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. ~~or kg~~ per day)* Upper Bound	Normal Range (in lbs. ~~or kg~~ per day)* Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. ~~or kg~~)*	Months of the Release
Hydrochloric Acid	7647-01-0	21,344	12,088	365	5,699,882	12
Hydrofluoric Acid	7664-39-3	1,218	689	365	346,341	12
Sulfuric Acid	7664-93-9	5,184	2935	365	633,861	12

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)* Upper Bound	Normal Range of Components (in lbs. or kg per day)* Lower Bound	Normal Range of Mixture (in lbs. or kg per day)* Upper Bound	Normal Range of Mixture (in lbs. or kg per day)* Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release

* *Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 626033

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Hydrochloric Acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., ~~kg, or Ci~~)
Stack	21,344

TOTAL - SSI trigger for this hazardous substance release* : 21,344 lbs

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 626033

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Hydrofluoric Acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., ~~kg, or Ci~~)
Stack	1,218

TOTAL - SSI trigger for this hazardous substance release* : 1,218 lbs

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 626033

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Sulfuric Acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., ~~kg, or Ci~~)
Stack	5,184

TOTAL - SSI trigger for this hazardous substance release* : 5,184 lbs

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

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SECTION I: GENERAL INFORMATION

CR-ERNS Number: 626033

Date of Initial Release: 10/14/2002

Date of Initial Call to NRC: 10/14/2002

Type of Report: Indicate below the type of report you are submitting.

- [X] Initial Written Notification
- [ ] First Anniversary Follow-up Report
- [ ] Written Notification of a Change to Initial Notification
- [ ] Written Notification of a Change to Follow-up Report

Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is accurate and current to the best of my knowledge.

Michael L. Menne, V.P. Environmental, Safety + Health
Name and Position

20 December 2002
Date

Signature

Part A. Facility or Vessel Information

Name of Facility or Vessel: Coffeen Power Station

Person in Charge of Facility or Vessel

Name of Person in Charge: Jim Williams
Position: Plant Manager
Telephone No.: (217) 534-7646 Alternate Telephone No.: (217) 534-7600

Facility Address or Vessel Port of Registration

Street: 134 CIPS Land County: Montgomery
City: Coffeen State: IL Zip Code: 62017

Dun and Bradstreet Number for Facility: 364138990

Facility/Vessel Location

Latitude Deg 39 Min 03 Sec 31
Longitude Deg 089 Min 24 Sec 11

Vessel LORAN Coordinates:

Part B. Population Information

Population Density

Choose the range that describes the population density within a one-mile radius of your facility or vessel (Indicate by placing an "X" in the appropriate blank below).

- ____ 0 - 50 persons
- X 51 - 100 persons
- ____ 101 - 500 persons
- ____ 501 - 1000 persons
- ____ more than 1000 persons

Sensitive Populations and Ecosystems Within One Mile Radius

Sensitive Populations or Ecosystems (e.g., schools, hospitals, wetlands, wildlife preserves, etc.)	Distance and direction from facility
None	

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 626033

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Name of Source: Coffeen Power Station Stack

1. Indicate whether the release from this source is either:

continuous without interruption ___X___ **OR** routine, anticipated, intermittent _____.

2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*

Power Generation - Coal combustion
96% Bituminous
4% Subbituminous

3. Identify below how you established the pattern of release and calculated release estimates.

X Past release data	X Knowledge of the facility/vessel's operations and release history	X Engineering estimate
____ AP-42	X Best professional judgment	____ Other (explain)

** Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.*

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 626033

Name of Source: Coffeen Power Station Stack

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

⊘ **AIR** X (stack X or area ____) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

- If identified source is a **stack**, indicate stack height: 500 feet ~~or meters~~; **OR**
- If identified source is an **area source** (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: _____ square feet or square meters.

⊘ **SURFACE WATER** ____ (stream ____, lake ____, or other _____)

- If the release affects any **surface water body**, give the name of the water body.

  _____

- If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

  stream order: ____ or average flow rate: ____ cubic feet/second; **OR**

- If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

  surface area of lake: ____ acres and average depth of lake: ____ meters.

⊘ **SOIL OR GROUND WATER** ____

If the release is on or under ground, indicate the distance to the closest water well.

_____

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. **If this information is not provided, EPA will make conservative assumptions about the appropriate values.** Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

- For a stack release to air, provide the following information, if available:

  Inside diameter _____ feet or meters
  Gas Exit Velocity _____ feet/second or meters/second
  Gas Temperature _____ degrees Fahrenheit, Kelvin, or Celsius

- For a release to surface water, provide the following information, if available:

  Average Velocity _____ feet/second of Surface Water

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 626033

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Coffeen Power Station Stack

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Hazardous Substance	CASRN #	Normal Range (in lbs. ~~or kg~~ per day)* Upper Bound	Normal Range (in lbs. ~~or kg~~ per day)* Lower Bound	Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs. ~~or kg~~)*	Months of the Release
Hydrochloric Acid	7647-01-0	21344	12088	365	3,294,729	12
Hydrofluoric Acid	7664-39-3	1218	689	365	187,980	12
Sulfuric Acid	7664-93-9	5184	2935	365	800,208	12

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.)

Name of Mixture	Name of Hazardous Substance Components	CASRN#	Weight Percentage	Normal Range of Components (in lbs. or kg per day)* Upper Bound	Normal Range of Components (in lbs. or kg per day)* Lower Bound	Normal Range of Mixture (in lbs. or kg per day)* Upper Bound	Normal Range of Mixture (in lbs. or kg per day)* Lower Bound	Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the Release

** Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 626033

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Hydrochloric Acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., ~~kg, or Ci~~)
Stack	21,344

TOTAL - SSI trigger for this hazardous substance release* : 21,344 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 626033

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Hydrofluoric Acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., ~~kg, or Ci~~)
Stack	1218

TOTAL - SSI trigger for this hazardous substance release* : 1,218 lbs

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 626033

Calculation of the SSI Trigger

For EACH hazardous substance or hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance. Photocopy this page if necessary.

Name of Hazardous Substance: Sulfuric Acid

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., ~~kg, or Ci~~)
Stack	5184

TOTAL - SSI trigger for this hazardous substance release* : 5,184 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate, so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*